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REMARKS

Claims 1-34 are pending of which claims 1, 25, 27, 30 and 31 are independent.

Claim Rejections Pursuant to 35 U.S.C. §102(e)

Claims 1-7, 14-15 and 17-31 were rejected under 35 U.S.C. §102(e) as being anticipated by deVries et al (United States Patent Number 6, 311, 189, hereafter "deVries"). For the reasons set forth below, Applicants respectfully traverse the rejections.

Summary of Claimed Invention

The claimed invention claims a method for cross-referencing, searching and displaying entries in a document publishing system. The publishing system uses input data such as email messages, attachments to emails, web clippings, audio and video data files, and user input text, to create new documents, such as web pages viewable via a web browser. Unique identification numbers are automatically assigned to entries in the publishing system and naturally occurring segments of entries, such as headings and paragraphs separated by whitespace. User assigned labels may be attached to user selected segments of each entry. The identification numbers and labels are cross-linked by a series of algorithms. Changes in content of an entry are saved as updates with the latest version cross-linked to previous versions. The labels applied to the previous version of the entry are automatically applied to the corresponding segments of the updated entry, even if the labeled segments are updated or rearranged by the update action. The cross-linking of entries enables users to search by time (content), by topic (label), or both. Different versions of content in an entry may be displayed to a user such that the evolution of an entry over time is revealed. Searching may also be conducted using labels or topics as keywords such that either user-attached labels or automatically generated labels from the cross-linking algorithms are used to generate documents for users which display references to entries and/or items containing the particular label or topic. Documents generated by the illustrative embodiment include links to other entries and/or items which are associated with the content being displayed to the user. The user assigned labels also enable a search mechanism to quickly assemble user-defined relevant portions of each entry while omitting extraneous matters contained in the entries.

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<u>Summary of Claim Amendments</u>

Applicants have amended independent claims 1 and 27 to indicate that the altering of the entries may be the altering of either data in an entry or a label associated with the entry. Applicants have also amended claims 1, 25, 27, 30 and 31 to indicate that the altered entry and the originally selected entry share a substantially similar file format. Applicants have also added dependent claims 32-34 (which are dependent upon claim 1) to indicate that the altering of the label of an entry may be the removal of a label, the addition of a label, and a removal of a label and an addition of a label.

<u>Summary of deVries</u>

The Examiner-cited reference deVries discusses a method of matching a query to a portion of media. The query is used to search an index of annotations related to the media for which search results are desired. Queries are matched to annotation values in an annotation index. The result of the matching process enables a start time for the portion of media of interest in a media stream to be identified.

<u>Argument</u>

The cited reference deVries fails to disclose all of the elements of Applicants independent claims as amended. Accordingly, deVries fails to anticipate any of the pending claims in Applicants invention.

The search method discussed in deVries relies heavily on translating the original media stream data into a secondary format as part of the annotation process. The Examiner's attention is respectfully directed to the discussion of the digitization, encoding and decoding process discussed throughout deVries, and with particularity to the discussion that appears at columns 10 and 11. The discussion of figure 2 in column 10 indicates that the first step in the processing steps for the encoder client is to digitize the raw audio/video data with a digitizer(see col. 10, lines 31-35 and Figure 2). "The digitized audio/video is then encoded by a primary encoder 42, which generates a primary bit stream 44 for the first digital representation of the raw audio/video data 12 and a prediction of the primary bit stream 46 for the first digital representation of the raw audio/video data 12. The prediction of the primary bit stream for the first digital representation

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of the raw audio/video data 12 is separately encoded by a secondary encoder 45 to generate a secondary bit stream 46 for the first digital representation of the raw audio/video data 12. (see col. 10, lines 35-44)." The primary bit stream and secondary bit streams are then combined to form the first digital representation (see col. 10, lines 45-51). A copy of the first digital representation of the raw audio/video data is then processed by the annotation client to generate the annotations for the objects in the meta database that correspond to the original audio/video data. (see col. 14, lines 16-20). In other words, it is the transformed data that is annotated. Similarly, the discussion of the encoding process depicted in Figure 4 also indicates how much deVries relies on changing the original data. The discussion of Figure 4 notes "This encoding process 60 comprises digitized audio/visual data 62, a differencing function 64, a discrete cosine transform (DCT) function 66, a quantization(Q) function 68, an inverse quantization (invQ) function 70, an inverse discrete cosine transform function (IDCT) 72, an adding function 74, a motion estimation function 76, a motion compensation function 78, and a delay function 80 (see col. 11, lines 38-44)."

The end result of the encoding process in deVries is transformed data that has been altered into a different file format from the original data. It is this transformed data that is used to create the annotations that appear in the annotation index that is searched in response to a query. The sections of deVries cited by the Examiner discussing the annotation client and annotations utilize this transformed data. This process in deVries contrasts with Applicants claims in which the independent claims have been amended to clarify that the updated entry and the original entry have substantially similar file formats. Put another way, the cross-references and labels used in the claimed invention do not transform the format of the underlying data as the process in deVries requires. Accordingly, Applicants respectfully suggest that all of the pending claims are currently in condition for allowance as the cited reference deVries fails to disclose all of the elements of Applicants claims.

Indication of Allowable Subject Matter

Claims 8-13 and 16 were objected to by the Examiner as being dependent upon a rejected base claim but were indicated to be allowable if re-written in independent form including all of

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the limitations of the base claim and any intervening claims. Applicants appreciate the indication of the allowability of the claims from the Examiner. However, Applicants respectfully decline to rewrite the claims at this time as Applicants believe all of the claims are presently allowable in view of the current amendments and the arguments submitted above.

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CONCLUSION

In view of the above Amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe a three month extension fee in the amount of $510.00 is due with this statement. Please charge that fee, and any additional fees that may be due, to our Deposit Account No. 12-0080, under Order No. TSQ-001 from which the undersigned is authorized to draw.

Dated: January 3, 2005   Respectfully submitted,

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